

EXHIBIT 13

<p style="text-align: center;">Contains Confidential Portions</p> <p style="text-align: right;">Page 78</p> <p>1 JESSE ANGELO</p> <p>2 A I don't know.</p> <p>3 Q What is the policy on sex</p> <p>4 discrimination at New York Post?</p> <p>5 MR. LERNER: Objection.</p> <p>6 A It's not tolerated.</p> <p>7 Q What do you mean by "It's not</p> <p>8 tolerated"?</p> <p>9 MR. LERNER: Objection.</p> <p>10 A We don't tolerate sexual</p> <p>11 harassment. That's the policy.</p> <p>12 Q What is sexual harassment in your</p> <p>13 understanding?</p> <p>14 MR. LERNER: Objection.</p> <p>15 A I'm not a lawyer. I'm not</p> <p>16 qualified to define sexual harassment.</p> <p>17 That's a huge area of case law, is my</p> <p>18 understanding. You are probably more</p> <p>19 qualified than I am to answer that.</p> <p>20 Q So as you sit here today, you can't</p> <p>21 tell me what sexual harassment is?</p> <p>22 MR. LERNER: Objection.</p> <p>23 A Are you asking me to give a legal</p> <p>24 definition of sexual harassment?</p> <p>25 Q No. I'm just asking for your</p> <p style="text-align: right;">TSG Reporting - Worldwide 877-702-9580</p>	<p style="text-align: center;">Contains Confidential Portions</p> <p style="text-align: right;">Page 79</p> <p>1 JESSE ANGELO</p> <p>2 understanding.</p> <p>3 What is sexual harassment that is</p> <p>4 prohibited by The New York Post policy on</p> <p>5 sexual harassment in the workplace?</p> <p>6 MR. LERNER: Objection.</p> <p>7 A There could be any one of many</p> <p>8 hypothetical examples of what would</p> <p>9 constitute sexual harassment. I don't think</p> <p>10 it's my place to give you hypothetical</p> <p>11 examples of what sexual harassment is.</p> <p>12 Q I'm not asking hypothetical</p> <p>13 examples. I'm just --</p> <p>14 A Then what are you asking.</p> <p>15 Q What is what is your understanding</p> <p>16 of what is sexual harassment?</p> <p>17 MR. LERNER: Objection.</p> <p>18 A Again, there are lots of different</p> <p>19 things, in my limited understanding, that</p> <p>20 can constitute sexual harassment.</p> <p>21 I don't feel qualified to give you</p> <p>22 hypothetical examples of what constitute</p> <p>23 sexual harassment.</p> <p>24 Q Is it part of your job as either</p> <p>25 Executive Editor of The Post -- actually,</p> <p style="text-align: right;">TSG Reporting - Worldwide 877-702-9580</p>
<p style="text-align: center;">Contains Confidential Portions</p> <p style="text-align: right;">Page 80</p> <p>1 JESSE ANGELO</p> <p>2 let me repeat that.</p> <p>3 Is it part of your job as Executive</p> <p>4 Editor of The Post to report any instances</p> <p>5 of sexual harassment that you witness?</p> <p>6 A Yes.</p> <p>7 Q So how would you know what to</p> <p>8 report if you don't know what sexual</p> <p>9 harassment is?</p> <p>10 MR. LERNER: Objection.</p> <p>11 A I know what sexual harassment is.</p> <p>12 That's not what you are asking me.</p> <p>13 Q So what is it?</p> <p>14 A Again, I believe there are many</p> <p>15 definitions of what could constitute sexual</p> <p>16 harassment.</p> <p>17 Q Okay. Give me one.</p> <p>18 MR. LERNER: Objection.</p> <p>19 A If someone demanded a sexual favor</p> <p>20 in return for a promotion, that would be</p> <p>21 sexual harassment.</p> <p>22 Q That would be an example of sexual</p> <p>23 harassment, right?</p> <p>24 A Is that a question?</p> <p>25 MR. LERNER: Objection.</p> <p style="text-align: right;">TSG Reporting - Worldwide 877-702-9580</p>	<p style="text-align: center;">Contains Confidential Portions</p> <p style="text-align: right;">Page 81</p> <p>1 JESSE ANGELO</p> <p>2 Q I believe you said there are many</p> <p>3 definitions of sexual harassment, right?</p> <p>4 A My understanding is that there are</p> <p>5 many different forms of what can constitute</p> <p>6 sexual harassment.</p> <p>7 Q Would dating a subordinate at</p> <p>8 The New York Post be considered sexual</p> <p>9 harassment?</p> <p>10 MR. LERNER: Objection.</p> <p>11 A No.</p> <p>12 Q Is there any policy at The New York</p> <p>13 Post regarding supervisors dating employees</p> <p>14 that they supervise?</p> <p>15 MR. LERNER: Objection.</p> <p>16 A No.</p> <p>17 Q Is there any policy at The New York</p> <p>18 Post governing supervisors having a sexual</p> <p>19 relationship with someone they supervise?</p> <p>20 A No.</p> <p>21 Q So you are familiar with The New</p> <p>22 York Post policy on sexual harassment,</p> <p>23 right?</p> <p>24 A In broad terms.</p> <p>25 Q As part of your job as</p> <p style="text-align: right;">TSG Reporting - Worldwide 877-702-9580</p>

<p style="text-align: center;">Contains Confidential Portions</p> <p style="text-align: right;">Page 378</p> <p>1 JESSE ANGELO</p> <p>2 don't know who all the editors on the City</p> <p>3 Desk are.</p> <p>4 Q When you were City Desk editor, how</p> <p>5 many African-American editors were there on</p> <p>6 the City Desk?</p> <p>7 A There were not any full-time</p> <p>8 African-American editors on the City Desk</p> <p>9 when I was the City editor.</p> <p>10 Q As far as you know, when was the</p> <p>11 last time there was a African-American</p> <p>12 editor on the City Desk at The New York</p> <p>13 Post?</p> <p>14 A Full time?</p> <p>15 Q Full time, yes.</p> <p>16 A As far as I know, Lisa Baird.</p> <p>17 Again, I don't know her exact racial makeup.</p> <p>18 I believe she was African-American.</p> <p>19 Q Were you at The Post the same time</p> <p>20 Lisa Baird was at The Post?</p> <p>21 A Yes.</p> <p>22 Q So was she fired or did she quit or</p> <p>23 how did she end up leaving?</p> <p>24 MR. LERNER: Objection.</p> <p>25 A I don't know the specifics of it,</p> <p style="text-align: right;">TSG Reporting - Worldwide 877-702-9580</p>	<p style="text-align: center;">Contains Confidential Portions</p> <p style="text-align: right;">Page 379</p> <p>1 JESSE ANGELO</p> <p>2 but I believe she was asked to leave.</p> <p>3 Q Asked to leave by whom?</p> <p>4 A By Col Allan.</p> <p>5 Q Do you know the circumstances under</p> <p>6 which she was asked to leave?</p> <p>7 A Col came in. There was a whole --</p> <p>8 after a short time of his tenure at the</p> <p>9 paper, there was a whole host of editors and</p> <p>10 columnists that were asked to leave.</p> <p>11 Q So did you actually know about this</p> <p>12 at the time or is this something you learned</p> <p>13 about later?</p> <p>14 A I was not specifically aware of the</p> <p>15 termination of Lisa Baird until it occurred.</p> <p>16 Q So but you knew about it at the</p> <p>17 time -- at the time she was fired, you knew</p> <p>18 she was being fired?</p> <p>19 MR. LERNER: Objection.</p> <p>20 A Can you repeat the question.</p> <p>21 (Requested portion of record read:</p> <p>22 "Q. So but you knew about it at</p> <p>23 the time -- at the time she was fired,</p> <p>24 you knew she was being fired?"</p> <p>25 (End of read-back.)</p> <p style="text-align: right;">TSG Reporting - Worldwide 877-702-9580</p>
<p style="text-align: center;">Contains Confidential Portions</p> <p style="text-align: right;">Page 380</p> <p>1 JESSE ANGELO</p> <p>2 A The use of "being there" is a</p> <p>3 strange ...</p> <p>4 At the time she was fired, yes, I</p> <p>5 was aware after the fact that she was let</p> <p>6 go, yes.</p> <p>7 Q I'm just trying to get to the point</p> <p>8 that this isn't something you learned years</p> <p>9 later, right?</p> <p>10 A That is correct.</p> <p>11 Q And has Col Allan ever spoken to</p> <p>12 you about that decision to fire Lisa Baird?</p> <p>13 A Not that I recall.</p> <p>14 MR. LERNER: Can we get a time</p> <p>15 check, Mr. Videographer.</p> <p>16 THE VIDEOGRAPHER: Twenty-four</p> <p>17 minutes and in three minutes will be</p> <p>18 seven hours.</p> <p>19 MR. CLARK: I think that's</p> <p>20 going to be it. Let's take a break</p> <p>21 and I'll consult with Mr. Datoo and</p> <p>22 see if there's anything else we want</p> <p>23 to ask him.</p> <p>24 THE VIDEOGRAPHER: The time is</p> <p>25 7:24. We're going off the record.</p> <p style="text-align: right;">TSG Reporting - Worldwide 877-702-9580</p>	<p style="text-align: center;">Contains Confidential Portions</p> <p style="text-align: right;">Page 381</p> <p>1 JESSE ANGELO</p> <p>2 (A brief recess was</p> <p>3 taken.)</p> <p>4 THE VIDEOGRAPHER: The time is</p> <p>5 7:32. We're back on the record.</p> <p>6 BY MR. CLARK:</p> <p>7 Q Mr. Angelo, while you were editor</p> <p>8 of the City Desk, did you ever have a</p> <p>9 romantic relationship or sexual relationship</p> <p>10 with any female copy assistants?</p> <p>11 A No.</p> <p>12 Q How much do you earn currently?</p> <p>13 MR. LERNER: Hold on. What's</p> <p>14 the relevance of that?</p> <p>15 MR. CLARK: Goes to bias.</p> <p>16 MR. LERNER: As he said, he's</p> <p>17 not even paid by The New York Post.</p> <p>18 MR. CLARK: That's a whole</p> <p>19 other issue. The whole relationship</p> <p>20 of NewsCorp and The New York Post is</p> <p>21 an issue in this case, and the fact</p> <p>22 that he's got this bizarre pay</p> <p>23 schedule is another interesting fact.</p> <p>24 So I think on both those issues we</p> <p>25 want to know not only who pays him</p> <p style="text-align: right;">TSG Reporting - Worldwide 877-702-9580</p>